

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Rhonda Garner d/b/a Décor Specialties, on behalf
of herself and all others similarly situated,

Plaintiffs,

07 CV 5607 (WCC) (MDF)

- against -

MBF Leasing, LLC, Lina Kravic, Brian Fitzgerald,
Sam Buono, and William Healy,

Defendants.

**MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

FILED
U.S. DISTRICT COURT
2007 SEP 27 PM 3:09
S.D.N.Y.

-----X
PURSUANT TO RULE 3.1(c) of the Local Rules of the United States District Courts
the Southern and Eastern Districts of New York, I Jennifer Nigro, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission, *pro*
hac vice of:

John M. Heaphy, Esq.
Harrison & Held, LLP,
333 West Wacker Drive
Suite 1700
Chicago, Illinois 60606
Tel. 312-753-6760
Fax 312-345-2005
e-mail: jheaphy@HarrisonHeld.com

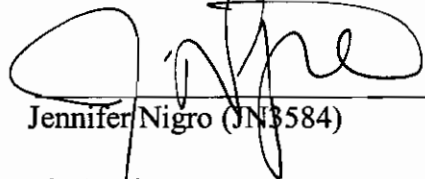
John M. Heaphy is a member in good standing of the bar of the State of Illinois and
the United States District Court for the Northern District of Illinois.

There are no pending disciplinary proceedings against John M. Heaphy in any State or Federal court.

Dated: September 27, 2007
New York, New York

Respectfully submitted,

MOSES & SINGER LLP
Attorneys for Defendants


Jennifer Nigro (JN3584)

405 Lexington Avenue
New York, New York 10174
Tel. 212-554-7800
Fax 212-554-7700
e-mail: jnigro@mosessinger.com

TO: Chittur & Associates, P.C.
Attorneys for Plaintiff
286 Madison Avenue
Suite 1100
New York, New York 10017

and

Seth R. Lesser, Esq.
Locks Law Firm
Attorneys for Plaintiff and the Class
100 East 55th Street
New York, New York 10022

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Defendants.

**AFFIDAVIT OF
JENNIFER NIGRO IN
SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

-----X
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

JENNIFER NIGRO, being duly sworn, hereby deposes and says:

1. I am an associate at the law firm of Moses & Singer LLP, counsel for Defendants in the captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit John M. Heaphy, Esq., as counsel *pro hac vice* to represent defendant, William Healy, in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 4, 2002. I am also admitted to the bar of the United States District Courts for the Southern, Northern, and Eastern Districts of New York. I am also a member in good standing of the bar of the State of New Jersey.

3. Mr. Heaphy is a partner at the law firm of Harrison & Held, LLP, located in Chicago, Illinois, and is a member in good standing of the bar of the State of Illinois. Annexed hereto is a current Certificate of Admission to the Bar of Illinois verifying Mr.

Heaphy's good standing. Mr. Heaphy is also admitted to practice before the United States District Court for the Northern District of Illinois and the United States Court of Appeals for the Seventh Circuit. Mr. Heaphy is a member of the Trial Bar for the Northern District of Illinois.

4. I have been working with Mr. Heaphy in connection with his representation of defendant William Healy in this action, and find him to be a skilled attorney and person of the utmost integrity. Mr. Heaphy is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

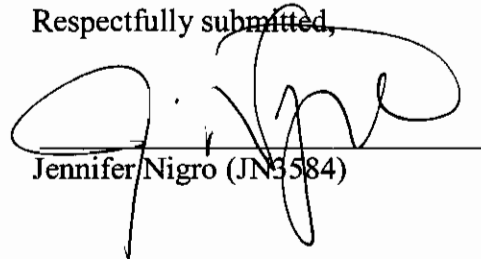
5. I am pleased to move the admission of John M. Heaphy, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of John M. Heaphy, *pro hac vice*, which is annexed hereto.

WHEREFORE, it is respectfully requested that the motion to admit John M. Heaphy, *pro hac vice*, to represent defendant William Healy in the captioned matter, be granted.

Dated: September 27, 2007
New York, New York

Respectfully submitted,



Jennifer Nigro (JN5584)

Sworn to before me this
27th day of September, 2007.



Notary Public

ROBERT LILLIENSTEIN
NOTARY PUBLIC, State of New York
No. 02LI0112765
Qualified in Suffolk County
Commission Expires July 12, 2008

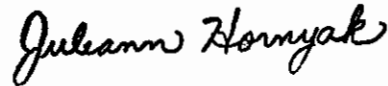
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

John Merrill Heaphy, III

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 5, 1981 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Wednesday, September 12, 2007.



Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Rhonda Garner d/b/a Décor Specialties, on behalf
of herself and all others similarly situated,

Plaintiffs,

07 CV 5607 (WCC) (MDF)

- against -

MBF Leasing, LLC, Lina Kravic, Brian Fitzgerald,
Sam Buono, and William Healy,

Defendants.

**ORDER FOR
ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

-----X
Upon the motion of Moses & Singer, LLP, attorneys for Defendants, and the sponsoring
attorney's affidavit of Jennifer Nigro (JN 3584) in support thereof:

IT IS HEREBY ORDERED that:

1. John M. Heaphy, Esq.
Harrison & Held, LLP,
333 West Wacker Drive
Suite 1700
Chicago, Illinois 60606
Tel. 312-753-6760
Fax 312-345-2005
e-mail: jheaphy@HarrisonHeld.com

is admitted to practice *pro hac vice* as counsel for defendant, William Healy, in the
captioned matter in the United States District Court for the Southern District of New
York.

2. All attorneys appearing before this Court are subject to the Local Rules of this
Court, including the Rules governing discipline of attorneys. If this action is assigned to
the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF
password at nysd.uscourts.gov.

3. Counsel has forwarded the *pro hac vice* fee to the Clerk of Court.

4. Let service of a copy of this Order on Chittur & Associates, P.C., 286 Madison Avenue, Suite 1100, New York, New York 10017, and Seth R. Lesser, Esq., Locks Law Firm, 100 East 55th Street New York, New York 10022, attorneys for plaintiffs, by First Class mail, on or before the ____ day of _____, 2007, be deemed good and sufficient service.

Dated: _____, 2007
White Plains, New York

U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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of herself and all others similarly situated,

Plaintiffs,

07 CV 5607 (WCC) (MDF)

- against -

AFFIDAVIT OF SERVICE

MBF Leasing, LLC, Lina Kravic, Brian Fitzgerald,
Sam Buono, and William Healy,

Defendants.

-----X
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Jennifer Nigro, being duly sworn, deposes and says: deponent is not a party to the action,
is over 18 years of age, and resides in New York, New York.

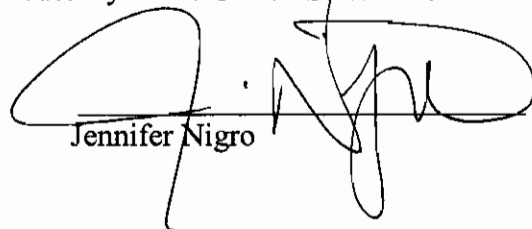
On September 27, 2007 deponent served a copy of Defendants' Motion to Admit John M.
Heaphy Pro Hac Vice on:

Chittur & Associates PC
Attorneys for Plaintiffs
286 Madison Avenue
Suite 1100
New York, NY 10017

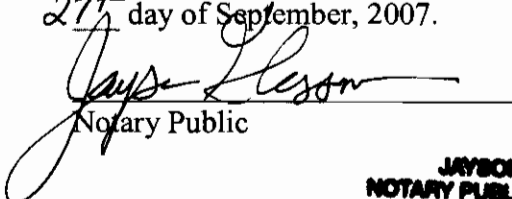
and

Seth R. Lesser, Esq.
Locks Law Firm
Attorneys for Plaintiff and the Class
100 East 55th Street
New York, New York 10022

by mailing a true copy thereof enclosed in a prepaid envelope, via first class-mail, in an
official depository, under the exclusive care and custody of the United States Postal
Service.


Jennifer Nigro

Sworn to before me this
27th day of September, 2007.


Notary Public

JAYSON GLASSMAN
NOTARY PUBLIC, State of New York
No. 02GL6115454
Qualified in New York County
Commission Expires Sept. 7, 2008